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Attorneys for Plaintiff/Counter Defendant
TESLA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TESLA, INC.,

Plaintiff,

v.

MARTIN TRIPP,

Defendant.

Case No. 3:18-cv-00296-MMD-CLB

**SUPPLEMENTAL DECLARATION OF
JEANINE ZALDUENDO IN SUPPORT
OF TESLA, INC.'S RENEWED
EMERGENCY MOTION FOR AN
ORDER TO SHOW CAUSE RE
SANCTIONS; AND RELATED RELIEF**

AND RELATED COUNTERCLAIMS

1 **I, Jeanine Zalduendo, declare as follows:**

2 1. I am a member of the bar of the State of California and an associate at Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Plaintiff and Counterclaim Defendant Tesla,
4 Inc. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness,
5 I could and would testify competently thereto.

6 2. I submit this supplemental declaration in Support of Tesla, Inc.'s Renewed
7 Emergency Motion for an Order to Show Cause regarding Sanctions; and Related Relief
8 ("Renewed Emergency Motion").

9 3. During the early morning of Wednesday, August 12, 2020, hours after this Court
10 issued an Order enforcing the Protective Order in this case, and directing Defendant Martin Tripp
11 immediately cease all dissemination of Tesla's confidential and "Attoreny's Eyes Only"
12 information in all forms via all means, [ECF No. 205], Mr. Tripp resumed posting Tesla's
13 confidential information on Twitter.

14 4. Attached hereto as **Exhibit 15** is a true and correct copy of Mr. Tripp's August 12,
15 2020 tweet providing a link to his case file containing Tesla's confidential information.

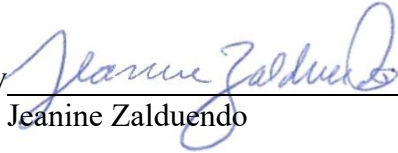
16 5. Attached hereto as **Exhibit 16** is a true and correct copy of Mr. Tripp's August 12,
17 2020 tweets admitting his violation of the Protective Order.

18 6. Attached hereto as **Exhibit 17** is a true and correct copy of Mr. Tripp's August 12,
19 2020 tweets directed at the Court and the Honorable Judge Baldwin.

20 7. Attached hereto as **Exhibit 18** is a true and correct copy of an August 12, 2020
21 email I sent to Mr. Tripp's counsel, meeting and conferring on Tesla's request that its confidential
22 information be immediately removed from Mr. Tripp's Twitter, YouTube, Google Drive, and any
23 other public location, or Tesla would be filing this Renewed Emergency Motion.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct and that this document was executed in Los Angeles, California.

3 DATED: August 12, 2020

4
5 By 
6 Jeanine Zalduendo